

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ZHU ZHAOXIN

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Crim. No. 04-10156-WGY

GOVERNMENT'S MOTION PURSUANT TO U.S.S.G. §3E1.1

The United States, by and through Michael J. Sullivan, United States Attorney, and the undersigned Assistant United States Attorney, hereby moves, pursuant to section 3E1.1(b) of the United States Sentencing Guidelines, that in addition to finding that Defendant has accepted responsibility for his conduct, the Court further reduce Defendant's Guidelines Total Offense Level by a third point. In support therefor, the government states that Defendant has assisted authorities in the prosecution of his case by giving timely notification of his intention to enter a guilty plea, thereby permitting the government to avoid preparing for trial, and permitting the government and the Court to allocate their resources efficiently.

Respectfully submitted,
MICHAEL J. SULLIVAN

By:

/s/ Gregory Moffatt
GREGORY MOFFATT
Assistant U.S. Attorney
617-748-3370

DATED: September 28, 2005